

**MULTICULTURAL ALLIANCE FOR A SAFE ENVIRONMENT (MASE)**  
**P.O. Box 4254, Albuquerque, NM 87196 • 505-262-1862 (office) • 505-262-1864 (fax)**

**Core Groups:**

**Bluewater Valley Downstream Alliance**  
*Milan*

**Dineh Bidzili Coalition**  
*Navajo Nation*

**Eastern Navajo Diné Against Uranium Mining (ENDAUM)**  
*Churchrock and Crownpoint*

**Laguna-Acoma Coalition for a Safe Environment**  
*Acoma and Laguna Pueblos*

**Post-71 Uranium Workers Committee**  
*Grants*

**Affiliated Groups:**

**Amigos Bravos**  
*Taos and Albuquerque*

**McKinley Community Health Alliance**  
*Gallup*

**Moquino Mutual Domestic Water Consumers Association**  
*Cebolleta*

**New Mexico Environmental Justice Working Group**  
*Albuquerque*

**New Mexico Environmental Law Center**  
*Santa Fe*

**Office of Peace, Justice and Creation Stewardship**  
*Gallup*

**Partnership for Earth Spirituality**  
*Albuquerque*

**Ramah Navajo Community**  
*Ramah*

**Red Water Pond Road Community Association**  
*Coyote Canyon Chapter*

**SAGE Council**  
*Albuquerque*

**Sierra Club Environmental Justice Office**  
*Flagstaff*

**Southwest Research and Information Center**  
*Albuquerque*

Nancy Sutley, Chair  
Council on Environmental Quality  
Executive Office of the President  
Washington, D.C. 20503

RE: Comments on CEQ Draft NEPA Guidance on  
Consideration of the Effects of Climate Change and  
Greenhouse Gas Emissions

Dear Ms. Sutley:

Please accept the Multicultural Alliance for a Safe Environment's ("MASE") comments on the Council of Environmental Quality's Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions.

MASE is a non-profit coalition of organizations from uranium impacted communities in New Mexico. Founded in 2008, MASE's mission is to advocate for uranium legacy contamination clean up and resist new uranium mining in New Mexico. MASE also advocates for renewable and community-centered energy development in New Mexico's uranium impacted communities.

As a general matter, MASE supports the Council's effort to draft guidance on considering the effects of climate change and greenhouse gas emissions for agencies' NEPA analyses. In particular, MASE is pleased to see that the Council recognizes and acknowledges the particular impacts that global warming has on tribal communities. Draft Guidance, p. 8. Additionally, MASE supports the concept of requiring federal agencies to analyze the combined impacts of a major federal action and the impacts that climate change may have on local resources, particularly water resources. However, MASE is concerned that the Draft Guidance is either incomplete or inadequate in certain key respects.

First, MASE is concerned about the Council's position that it does not propose to make the Guidance applicable to Federal land and resource management decisions. Draft Guidance, p. 3. However, resource management decisions

are the very first opportunity for Federal agencies to assess the impacts of their decisions, both on the programmatic and project level.

For example, in the context of uranium development, when the Department of Energy makes resource management decisions pursuant to its Uranium Leasing Program, its environmental impacts analysis should include an analysis of its program's impacts on the climate. Such analyses should also include the program's impacts on the affected environment's resources that may be impacted by climate change. This opportunity for analysis of climate impacts should also apply to Bureau of Land Management and U.S. Forest Service programmatic resource and land management decisions.

The Council's Guidance should also apply to resource management decisions on the project level. In the uranium development context, a Federal land management agency, for example, the U.S. Forest Service, should be required to evaluate the direct and indirect impacts a particular Plan of Operation would have on the climate as well as how the effects of climate change combined with the proposed project would impact local resources.

Additionally, MASE submits that when evaluating the climate impacts of any energy minerals development project, the impacts of the **entire** fuel chain are considered. For example, nuclear power is widely marketed as a "carbon free" energy source. See, e.g. <http://www.nei.org/keyissues/protectingtheenvironment/>. However, full fuel chain analyses have demonstrated that nuclear power generates far more greenhouse gas emissions than either solar or wind energy. Öko-Institut, *Comparison of Greenhouse Gas Emissions and Abatement Costs of Nuclear and Alternatives Energy Options from a Life-Cycle Perspective* ([http://www.oeko.de/publications/reports\\_studies/dok/659.php](http://www.oeko.de/publications/reports_studies/dok/659.php)). Therefore, when federal agencies analyze the impacts of uranium extraction operations under NEPA, the indirect full fuel chain impacts should be part of the analysis.

Finally, MASE believes that specific environmental justice guidance in the context of climate change is warranted. Uranium extraction in New Mexico has left a devastating legacy of radioactive and toxic heavy metal contamination (see, e.g., [http://www.epa.gov/region6/6sf/newmexico/grants/nm\\_grants\\_index.html](http://www.epa.gov/region6/6sf/newmexico/grants/nm_grants_index.html)) in predominantly poor and minority communities, including on tribal lands. Not only has the legacy caused an epidemic of public health concerns, but it has also led to wholesale resource destruction, most notably contamination of tens of thousands of acre feet of groundwater. *Id.* In an arid state like New Mexico – a state that is likely to become even drier in the future due to the effects of climate change – potable water supplies are not only going to be the primary economic driver in the future, but also the very basis for any community's continued viability.

<http://www.globalchange.gov/publications/reports/scientific-assessments/us-impacts/regional-climate-change-impacts/southwest>. New uranium mining is proposed for the same communities where past mining occurred. Because new uranium mining will have similar impacts on water, soil and air, the same low-income and minority communities that are already living with unremediated contamination from the last round of uranium mining will be subjected again to the impacts of uranium mining and their impacts on ever dwindling resources.

Moreover, the impacts of uranium mining on an environment affected by climate change are particularly amplified for indigenous communities because of the cultural and spiritual affiliation that local tribes have with natural resources. In many cases, indigenous communities do not consider ground and surface water, geographical features such as mountains and mesas, vegetation and wildlife “resources” to be exploited, but rather integral parts of the cultural and spiritual traditions that have been observed for thousands of years. Federal agencies responsible for making resource decisions on and near Tribal lands should have explicit guidance regarding how to weigh the impacts of their decisions on indigenous cultural and spiritual “resources” in the context of an environment changing due to global warming.

Thank you again for the opportunity to comment on the Draft Guidance.

Sincerely,

A handwritten signature in black ink, appearing to read "Nadine Padilla". The script is fluid and cursive, with the first name "Nadine" being more prominent than the last name "Padilla".

Nadine Padilla  
MASE Coordinator